

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

JUN 25 2014

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. ) No.  
 )  
LARRY LEE HENDERSON, )  
 )  
Defendant. )

**4:14CR00207 HEA/DDN**

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**  
**(Wire Fraud)**

A. INTRODUCTION

At all times relevant to the Indictment:

1. LARRY LEE HENDERSON, the defendant herein, resided within the Eastern District of Missouri.

2. In or around February 11, 2014, LARRY LEE HENDERSON (hereinafter referred to as "HENDERSON") claimed to be a bishop as well as pastor and chairman of the "Holy Temple National Assembly of Churches, Inc." (HTNAC), a/k/a World Council of the National Assembly of Churches Inc., located at 12299 Natural Bridge Road, Bridgeton, Missouri 63044.

3. HENDERSON further claimed to be operating or otherwise employed with four other businesses which also were located at 12299 Natural Bridge Road, Bridgeton, Missouri 63044 including: U.S. Ecclesiastical Court, Inc., U.S. Legal Services, Committee for Ex-Offender Equality, and a law firm hereinafter referred to as "W.A.A."

B. SCHEME TO DEFRAUD

4. Beginning on about February 11, 2014, and continuing until in or around at least June 2014, the exact dates being unknown, in the Eastern District of Missouri and elsewhere, defendant,

**LARRY LEE HENDERSON,**

devised, intended to devise, and knowingly participated in a scheme to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

5. It was a part of the scheme that on February 11, 2014, HENDERSON purchased a 2004 Chevrolet Tahoe bearing VIN \*\*\*\*\*8442 from Driver Seat Auto Sales, LLC (hereinafter referred to as “Driver Seat”) located in St. Charles, Missouri. The total purchase price for the vehicle was \$13,871.50. HENDERSON falsely and fraudulently presented Driver Seat with a down-payment of \$1200.00 which was in the form of a check drawn on PNC Bank account number \*\*\*\*\*17, titled “US Legal Services” and bore the signature of “R.W.” The check HENDERSON provided to Driver Seat was drawn on an account that did not exist.

HENDERSON completed the purchase of the 2004 Chevrolet Tahoe by financing the remaining \$12,671.50 with an outside lender, Nicholas Financial, Inc., (hereinafter referred to as “Nicholas Financial”), located in St. Peters, Missouri. In order to obtain the financing from Nicholas Financial, HENDERSON completed a loan application document at Driver Seat. On the loan application, HENDERSON falsely and fraudulently claimed that he had been employed by the “US Ecclesiastical Court” for the last ten years and further falsely and fraudulently claimed that he drew a salary of \$5,800.00 per month. HENDERSON also provided Driver Seat with false and fraudulent documentation in support of his financing application including two fraudulent pay stubs from the “US Ecclesiastical Court, Inc.”, 300 North Tucker, St. Louis, Missouri, 63102 and a fraudulent 2013 Wage and Tax Statement (W-2) in the name of HENDERSON from the “US Ecclesiastical Court, Inc. d/b/a US Legal Services,” 12299 Natural Bridge Road, Bridgeton,

Missouri, 63044. The annual salary noted on HENDERSON'S fraudulent W-2 was \$62,882.56. HENDERSON'S loan application was transmitted via the internet from Driver Seat in St. Louis, Missouri, through "Dealertrack Technologies," (hereinafter referred to as "Dealertrack") a web-based, online credit application network for car dealerships. HENDERSON'S loan application was received and processed at Dealertrack's server located in New Jersey and then transmitted back to financing companies for receipt and review. Nicholas Financial received and reviewed HENDERSON'S loan application via Dealertrack and ultimately accepted HENDERSON'S loan application. Driver Seat then hand-delivered to Nicholas Financial the contract and supporting documents. HENDERSON left the dealership in the 2004 Chevrolet Tahoe.

6. On February 14, 2014, Driver Seat filed via the Missouri Department of Revenue website a Notice of Lien Application for HENDERSON'S 2004 Chevrolet Tahoe. The form listed the owner as "LARRY HENDERSON" and the lienholder as "Nicholas Financial I".

7. Driver Seat later attempted to deposit the check provided by HENDERSON as a down-payment for the vehicle but was notified by the bank that the check was being returned due to the fact that the PNC account upon which it was written was a closed account.

8. It was further part of the scheme that in February 2014, and April, 2014, Driver Seat had numerous conversations with HENDERSON as well as "R.W." and "P.L.," by phone, U.S. mail, and e-mail relative to making good on the down-payment. "R.W." and "P.L." claimed to be affiliated with and speaking on behalf of US Legal Services and the Ecclesiastic Court.

9. It was further part of the scheme that on about April 4, 2014, HENDERSON provided Driver Seat with a cashier's check in the amount of \$1,250.00 to satisfy the amount owed for the down-payment. Driver Seat was able to cash the cashier's check.

10. It was further part of the scheme that on or about April 11, 2014, HENDERSON presented a fully completed and signed fraudulent Missouri Department of Revenue Notice of Lien Release (hereinafter referred to as "DOR Lien Release") for the 2004 Chevrolet Tahoe to "C.I." a licensed notary located in St. Louis, Missouri, and requested that the document be notarized. The fraudulent form noted that Nicholas Financial released the lien on the 2004 Chevrolet Tahoe. The name of the lienholder was listed as Nicholas Financial and the name and forged signature of the lienholder's agent was "Demond Smith." The fraudulent DOR Lien Release was not signed in C.I.'s presence but C.I. nonetheless used his/her notary stamp and raised seal to notarize the document. HENDERSON took the notarized document and left the business.

11. It was further part of the scheme that on or about April 25, 2014, HENDERSON fraudulently applied for and received a loan in the amount of \$4,000.00 from Missouri Title Loan Company (hereinafter referred to as "Missouri Title Loan"), located at 7262 Natural Bridge Road, St. Louis, Missouri. In order to obtain the loan, HENDERSON provided Missouri Title Loan with fraudulent information on the loan application. HENDERSON falsely and fraudulently advised that he had been employed by R.W. at "US Legal" for the last 8 years and that he was paid a salary of \$2,370.00 every two weeks. HENDERSON further provided Missouri Title Loan with the fraudulent DOR Lien Release which falsely reflected that Nicholas Financial released the lien on the 2004 Chevrolet Tahoe. Additionally, HENDERSON completed an application for a Missouri Title and License with the owner listed as HENDERSON and the new lienholder was noted as Missouri Title Loans. HENDERSON later cashed a check in the amount of \$4,000.00 at U.S. Bank, located in Normandy, Missouri, drawn on the account of Missouri Title Loan Company. HENDERSON requested that \$2,000.00 of the check be returned to him as cash while the remaining \$2,000.00 was to be placed on a cashier's check payable to the "Holy Temple National Assembly Church."

12. It was a further part of the scheme, and as a result of the scheme, that on or about April 25, 2014, Missouri Title Loans forwarded by means of the United States Postal Service HENDERSON'S fraudulent lien release document and application for new title to Missouri Title Loan's parent office located in Springfield, Missouri. Missouri Title Loan delivered HENDERSON'S fraudulent DOR Lien Release to the Missouri Department of Revenue to modify the lien but the Department of Revenue refused to issue a new lien and the lien remained in the name of Nicholas Financial.

13. It was further part of the scheme, that on or about April 28, 2014, HENDERSON applied for and received an additional loan in the amount of \$1,200.00 at Missouri Title Loan Company based on the fraudulent loan application previously submitted by HENDERSON. HENDERSON cashed that check at a U.S. Bank located in Normandy, Missouri.

14. Between on or about March 12, 2014 through April 15, 2014, numerous payments for the 2004 Tahoe were wired from bank accounts affiliated with HENDERSON to Nicholas Financial. All but one of the payments were returned for having insufficient funds. Some payments were purportedly drawn on non-existent accounts.

C. THE WIRE

15. On or about February 11, 2014, in the Eastern District of Missouri and elsewhere, the defendant,

**LARRY LEE HENDERSON,**

for the purpose of executing the above-described scheme and artifice to defraud and to obtain money and property and in attempting to do so, did knowingly cause to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, to wit: a loan application containing false information to Nicholas Financial, Inc., which was submitted and processed via the internet through Dealertrack Technologies, a web-based, online credit



application network for car dealerships, which transfer was routed through Dealertrack Technologies servers located in Piscataway, New Jersey.

In violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT TWO**  
**(Mail Fraud)**

16. The grand jury reincorporates by reference as if fully stated herein paragraphs 1-14 of this Indictment.

D. THE MAIL

17. On or about April 25, 2014, within the Eastern District of Missouri and elsewhere, the defendant,

**LARRY LEE HENDERSON,**

for the purpose of executing and attempting to execute the above-described scheme to defraud, and to obtain money and property and in attempting to do so, knowingly caused to be delivered by the United States Postal Service, according to the directions thereon, a fraudulent Missouri Department of Revenue Lien Release to Missouri Title Loans, Springfield, Missouri.

In violation of Title 18, United States Code, Sections 1341 and 2.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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JENNIFER J. ROY, #47203MO  
Assistant United States Attorney